

From: 17
To:
Subject: RE: illegal blockade of Ottawa streets and Parliament Hill
Date: February 17, 2022 2:42:12 PM

Hi 17

21(1)(b)

17

From: 17 @fcc-fac.ca>
Sent: February 17, 2022 8:37 AM
To: 17 @fcc-fac.ca>
Subject: RE: illegal blockade of Ottawa streets and Parliament Hill

Hi 17

Thanks for sending this. With the enactment of the Emergencies Act, FCC will be required to freeze personal and business accounts of participants in the illegal blockades if the federal government directs us to.

We will make risk-rating decisions once the government provides us with the names or when we become aware of actual criminal charges against participants that are FCC customers.

Thanks,

17
Tel/Tél.: 17

From: 17 @fcc-fac.ca>
Sent: February 16, 2022 3:58 PM
To: 17 @fcc-fac.ca>
Subject: illegal blockade of Ottawa streets and Parliament Hill

Good afternoon 17
Please have a look through the pictures on this website:



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RÊVER. BÂTIR. RÉUSSIR.

From: [REDACTED] 17 fcc-fac.ca>

Sent: February 22, 2022 3:28 PM

To: GRP-CO: Operations VP & EC/VP et Coord exéc Opérations <OperationsVP&EC@fcc-fac.ca>;

GRP-ON: DD & SDD/DR et DRS <ondsdd@fcc-fac.ca>

Cc: [REDACTED] 17 @fcc-fac.ca>; [REDACTED] 17 @fcc-fac.ca>; [REDACTED] 17
<[REDACTED] 17 @fcc-fac.ca>; [REDACTED] 17 <[REDACTED] 17 fcc-fac.ca>; [REDACTED] 17 <[REDACTED] 17 @fcc-fac.ca>; [REDACTED] 17 @fcc-fac.ca>

Subject: Emergencies Act - Ops Leader awareness

Hi all. As you are no doubt aware, the Emergencies Act motion was passed in the House of Commons yesterday. This will have implications for FCC and some of our customers. Of course this is all very new. [REDACTED] 17 and [REDACTED] 17 team are working hard to determine how FCC will address our duties under the act in a, "reasonable, responsible and smooth" manner. [REDACTED] 17 along with [REDACTED] 17, [REDACTED] 17 and myself form a small working group to help guide us through the implications the act will have on FCC, our staff and customers

To that end, we are working on a communication that will go to ops staff shortly (currently with translation) to provide direction on what to do should they become aware of customer involvement in the protests. [REDACTED] 21(1)(b)

[REDACTED] More detail will be provided in the email to ops staff.

Please cascade to your leadership teams to make them aware of that an ops staff communication will be coming shortly.

Thanks.

[REDACTED] 17

[REDACTED] 17

[REDACTED] 17

FCC | FAC

[REDACTED] 17 [REDACTED] [REDACTED] [REDACTED]

Tel/Tél. : [REDACTED] Cell. : [REDACTED] 17 Fax: [REDACTED] 17

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[FCC social media / Médias sociaux FAC](#)



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RÊVER. BÂTIR. RÉUSSIR.

From: 17 17
To: GRP-CO: Operations Field Staff
Cc: 17
Subject: How the Emergencies Act affects FCC / Incidence de la Loi sur les mesures d'urgence sur FAC
Date: February 23, 2022 8:34:08 AM
Attachments: image001.jpg
Importance: High

Good morning everyone,

As you're likely aware, the Emergencies Act was enacted on February 14, 2022, passed in a House of Commons vote on February 21, 2022, and is awaiting approval by the Senate. Like other financial institutions, FCC has been working diligently to understand the scope of the Act and to put controls in place to ensure compliance.

FCC will take a **balanced and responsible** approach to meet expectations of the Act. Although we continue to assess the Act's impact for FCC, our approach as always with integrity issues is to take action when we have reasonable, objective and verified information.

If you become aware of potential customer involvement in blockades, occupations and other support of activity related to the "Freedom Convoy," you must submit a tip to the Customer Diligence Centre (CDC) at [RES-CO: Customer Diligence Centre](#). Include the customer's name, stated involvement, date and any other pertinent details. Please do not complete any investigative work yourself or communicate any information about FCC's approach to customers who voluntarily disclose their involvement. [Refer to the job aid](#) for more information on the process for reporting possible integrity issues.

The CDC screens existing and prospective customers against watch lists and industry intelligence information. Any individual and entities that have been verified by the authorities as participating in illegal activity under the Act will face appropriate action, which

Bonjour tout le monde,

Comme vous le savez sans doute, la *Loi sur les mesures d'urgence* a été promulguée le 14 février 2022, puis adoptée à la Chambre des communes au terme d'un vote le 21 février 2022. Elle est en attente d'approbation par le Sénat. Comme toute autre institution financière, FAC fait preuve de diligence afin de comprendre la portée de la *Loi* et de mettre en place des mesures de contrôle visant à assurer la conformité à cette dernière.

FAC adoptera une approche **équilibrée et responsable** afin de satisfaire aux dispositions de la *Loi*. Bien que nous continuions d'évaluer l'incidence de la *Loi* sur FAC, notre approche a toujours été de prendre des mesures à l'égard des problèmes d'intégrité lorsque nous disposons de renseignements raisonnables, objectifs et vérifiés pour le faire.

Si vous apprenez qu'un client potentiel a participé à des barrages ou à des occupations ou encore soutenu toute autre activité liée au « convoi de la liberté », vous devez soumettre cette information au Centre de diligence clientèle (CDC) en lui envoyant un courriel à l'adresse [RES-CO: Customer Diligence Centre/Centre de diligence clientèle](#). Veuillez inclure le nom du client, l'implication en question, la date ainsi que tout autre détail pertinent. Veuillez ne pas mener votre propre enquête et ne pas communiquer de renseignements au sujet de l'approche de FAC aux clients qui divulguent volontairement leur participation. Veuillez consulter [l'aide-mémoire](#) pour obtenir plus d'informations sur le processus de signalement de problèmes

will include not onboarding those found to violate the Act, freezing disbursements and assessing the need to terminate business relationships. The CDC will involve other internal partners to determine what action will be taken, and the decision will be communicated to those involved with the customer and lending relationship. The approach for notifying the customer/potential customer will also be discussed.

The Emergencies Act creates new requirements for financial institutions and, as I'm sure you can appreciate, there are many unanswered questions at this point. We will continue to share information as it becomes available. In the meantime, if you become aware of a customer's involvement, report it immediately to the CDC. If a customer contacts you to disclose their involvement, collect details from them and let them know you're required to share the information with the CDC team who will determine any action that may be taken to ensure FCC's compliance with the Emergencies Act. Please refrain from any speculation about action that might be taken, and thank the customer for letting you know about their involvement.

If you have any questions, please talk to your leader.

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d'intégrité éventuels.

Le CDC examine les clients existants et potentiels en utilisant des listes de surveillance et des renseignements de l'industrie. Toute personne ou entité qui, au terme d'une vérification par les autorités, a participé à une activité illégale en vertu de la *Loi* fera face aux mesures qui s'imposent, ce qui comprend ne pas faire affaire avec de nouveaux clients ayant violé la *Loi*, geler les décaissements et évaluer le besoin de mettre fin à des relations d'affaires avec des clients existants. Le CDC fera intervenir d'autres partenaires internes afin de déterminer quelles mesures doivent être prises et la décision sera communiquée aux employés qui participent à la relation avec le client potentiel ou l'emprunteur actuel. L'approche adoptée pour informer les clients existants et potentiels fera également l'objet de discussions.

La *Loi* prévoit de nouvelles exigences pour les institutions financières et comme vous vous en doutez bien, j'en suis certaine, il y a encore plusieurs questions qui demeurent en suspens à ce point-ci. Nous poursuivrons les communications à mesure que nous disposerons d'autres renseignements. Dans l'intervalle, si vous êtes au courant de l'implication d'un client, veuillez en aviser immédiatement le CDC. Si un client communique avec vous pour discuter de son implication, recueillez les détails de sa part et dites-lui que vous êtes dans l'obligation de communiquer ces renseignements au CDC, qui déterminera toute mesure pouvant être prise pour assurer la conformité de FAC à la *Loi*. Veuillez ne pas spéculer sur les mesures qui pourraient être prises et remercier le client de vous avoir informé de son implication.

Si vous avez des questions, veuillez en discuter avec votre gestionnaire.

From: 17
To:
Subject: Emergencies Act - Customers Identified
Date: February 25, 2022 11:23:00 AM

Good morning 17

I am following up with you regarding the customers that you have identified as possibly participating in the 2022 Freedom Convoy. When you have a moment, I'd like to discuss this a bit further with you. Do you have some time to chat today?

I look forward to your reply.

Thanks

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17

FCC/FAC

1800 Hamilton Street, PO Box 4320 / 1800, rue Hamilton, CP 4320

Regina SK S4P 4L3

Tel/Tél.: 17

Cell/Cel.: 17

[fcc.ca / fac.ca](http://fcc.ca/fac.ca)

[FCC social media / Médias sociaux FAC](#)



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2022 Freedom Convoy - Tips							
T i p	Date	Customer Name	Customer Number	Tipster	Preliminary Findings	Investigation File Number	Investigator
1	February 23, 2022	20(1)(c) [REDACTED]	20(1)(c) [REDACTED]	17 [REDACTED]	A January 20, 2022 a media article indicates that 20(1)(c) [REDACTED] was sending five trucks to Ottawa, including one that read, 20(1)(c) [REDACTED]. A photo published in a 20(1)(c) [REDACTED] article shows that on February 7, 2022, two 20(1)(c) [REDACTED] units were at the protest in Ottawa. 20(1)(c) [REDACTED] facebook page was not accessible. We cannot establish that the customers were at the protest when the Emergencies Act was in force.		17 [REDACTED]
2	February 23, 2022			17 [REDACTED]	On February 24, 2022, an email was sent to 17 [REDACTED] for information regarding a customer he had earlier identified to 17 [REDACTED] 17 [REDACTED] did not reply to the Senior Investigator's request for information.		17 [REDACTED]
3	February 24, 2022	[REDACTED]	[REDACTED]	17 [REDACTED]	A February 19, 2022 article identifies 19(1) [REDACTED] as 19(1) [REDACTED] residents operating as key figures in the occupation in Ottawa who were named in a recent class-action lawsuit. 19(1) [REDACTED] is described in the lawsuit		17 [REDACTED]

					19(1) This supports the customer was participating in the protest. There are three 19(1) listed in Jet from the 19(1) connection.		
6	February 24, 2022	19(1)	19(1)	17	19(1) disclosed that their accounts were frozen because of the customers' participation in the protest. Former FCC customers who want to come back. On February 21, 2022, 19(1) gave an interview to 19(1) disclosing that 19(1)	19(1)	17
7	February 24, 2022	19(1)	19(1)	17	Relationship Manager stated that 17 doesn't know the prospective customer, however, 17 was told by another FCC employee that 17 heard that 19(1) travelled to Ottawa to participate in the protest. 17 does not know when or how long 19(1) was there. Online queries could not establish that the customer was at the protest when the Emergencies Act was in force.		17

8	February 24, 2022	19(1)	19(1)	17	The information obtained in this investigation supports that the customer travelled to Ottawa and participated in the 2022 Freedom Convoy protest from February 12, 2022, to February 16, 2022. The customer's participation was a contravention of the Emergencies Act that was in effect during that time.	19(1)	17
9	February 25, 2022	20(1)(c)	20(1)(c)	17	A photo published on the website convoytraitors.ca depicts one of 20(1)(c) units parked at the protest in Ottawa. 20(1)(c) facebook page not accessible. We cannot establish that the customers were at the protest when the Emergencies Act was in force.		17